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9 Attorneys for USACM Liquidating Trust

10 **UNITED STATES BANKRUPTCY COURT**
11 **DISTRICT OF NEVADA**

12 In re:

13 USA COMMERCIAL MORTGAGE COMPANY,
14 USA CAPITAL REALTY ADVISORS, LLC,
15 USA CAPITAL DIVERSIFIED TRUST DEED FUND,
16 LLC,
17 USA CAPITAL FIRST TRUST DEED FUND, LLC,
18 USA SECURITIES, LLC,

Debtors.

19 **Affects:**

20 All Debtors
21 USA Commercial Mortgage Company
22 USA Capital Realty Advisors, LLC
23 USA Capital Diversified Trust Deed Fund, LLC
24 USA Capital First Trust Deed Fund, LLC
25 USA Securities, LLC

26 Case No. BK-S-06-10725-LBR
Case No. BK-S-06-10726-LBR
Case No. BK-S-06-10727-LBR
Case No. BK-S-06-10728-LBR
Case No. BK-S-06-10729-LBR

CHAPTER 11

Jointly Administered Under
Case No. BK-S-06-10725 LBR

**Objection Of The USACM Liquidating Trust
To Sandra I. Hollander Revocable Trust's
Claim Asserting Secured Status**

Hearing Date: October 15, 2007
Hearing Time: 9:30 a.m.

19 Sandra I. Hollander Revocable Trust filed Proof of Claim No. 10725-02532 against
20 USA Commercial Mortgage Company ("USACM"). The Proof of Claim asserts a secured
21 claim. The USACM Liquidating Trust (the "USACM Trust") hereby objects to Sandra I.
22 Hollander Revocable Trust's assertion that the claim is secured by a valid lien on USACM
23 property and moves this Court, pursuant to 11 U.S.C. § 502 and Rule 3007 of the Federal
24 Rules of Bankruptcy Procedure, for an order reclassifying Claim No. 10725-02532 as a
25 general unsecured claim. The USACM Trust is not, by this filing, objecting at this time to
26 any of the claims as unsecured claims or on grounds that the claims were untimely filed,

1 but reserves the right to do so. The basis for this Objection is fully explained in the
2 USACM Liquidating Trust's Motion for Summary Judgment Regarding (1) Responses to
3 the USACM Trust's First through Thirty-Third Omnibus Objections to Claims Asserting a
4 Secured Status; (2) Responses to the USACM Trust's First through Third Omnibus
5 Objections to Claims Asserting a Priority Status; And (3) Newly Alleged Secured And
6 Priority Claims (the "Motion"), filed today. The USACM Trust will serve a copy of the
7 Motion with this objection.

8 Dated: July 30, 2007.
9

10 **LEWIS AND ROCA LLP**

11 By: /s/ RC (#6593)

12 Susan M. Freeman, AZ 4199 (*pro hac vice*)

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